

Signed /s/ Monica Gambino

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Crown Castle USA Inc. and Crown Communication Inc.

Date filed: March 18, 2008

Name of companies covered by this certification:

Crown Castle USA Inc.
Crown Communication Inc.

Form 499 Filer ID: 821392 – Crown Castle USA Inc.
820426 – Crown Communication Inc.

Name of signatory: Monica Gambino

Title of signatory: Vice President, Legal

I, Monica Gambino, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that they are in compliance with the requirements set forth in Sections 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions against data brokers in the past year. The companies have no information with respect to the processes pretexters are using to attempt to access CPNI, and what additional steps companies are taking to protect CPNI beyond those required by the Commission.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____ /s/ Monica Gambino

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Crown Castle International Corp. SMR Subsidiaries

Date filed: March 18, 2008

Name of company covered by this certification: Crown Castle International Corp. de Puerto Rico

Form 499 Filer ID: 820424 - Crown Castle International Corp. de Puerto Rico

Name of signatory: Alejandro Quinones

Title of signatory: General Manager

I, Alejandro Quinones, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that it is in compliance with the requirements set forth in Sections 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year. The company has no information with respect to the processes pretexters are using to attempt to access CPNI, and what additional steps companies are taking to protect CPNI beyond those required by the Commission.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed /s/ Alejandro Quinones

Attachment
CPNI Policies and Procedures
Crown Castle International Corp.

1. Crown Castle International Corporation's operating companies (collectively "Crown Castle") are carriers' carriers providing localized intrastate wireless backhaul to other carriers and do not provide telecommunications services directly to end user customers, or are SMR licensees with only a few subscribers each.
2. Crown Castle may use, disclose, or permit third party access to CPNI without prior customer approval, only under limited circumstances. Crown Castle may use, disclose, or permit access to CPNI to provide services to which its customers already subscribe, and it is the current policy of Crown Castle that customers' CPNI will not be provided to any third parties, nor does Crown Castle use or allow third party access to CPNI, in any circumstances in which prior customer approval will be required. Crown Castle also does not currently engage in outbound marketing or cross-marketing that utilizes CPNI, or that otherwise requires prior customer approval.
3. If Crown Castle personnel seek to use CPNI for any sort of marketing purposes, they must first obtain appropriate approval by supervisory management and legal personnel and will comply with applicable recordkeeping requirements. Furthermore, with respect to use, disclosure, and access to CPNI within a Crown Castle customer's total services, all employees, contractors and consultants employed or engaged by Crown Castle are required to sign, as a condition of employment or engagement, statements of confidentiality and non-disclosure pertaining to all confidential proprietary information, including CPNI. Noncompliance with Crown Castle's CPNI policies can subject employees to disciplinary action up to and including termination.
4. CPNI may be used or disclosed to third parties, without customer approval, for the following purposes:
 - billing and collection;
 - administrative customer care services;
 - maintenance and repair services;
 - to protect Crown Castle's rights or property, or to protect users of Crown Castle's services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
 - responding to a lawful law enforcement request for such information; or
 - use of aggregate customer information – i.e., collective data relating to a group or category of Crown Castle services or customers from which individual identities and characteristics have been removed.
5. Crown Castle may not disclose CPNI based on customer-initiated contact by telephone or online to any entity without proper authentication. Insofar as Crown Castle is a carrier's carrier it does not have access to its customers' call detail information, but will provide CPNI over the phone only if the customer provides proper authentication. Customers' telephone access

to call detail information for the SMR licensees, as well as online access to their CPNI generally, requires a password. Crown Castle does not provide CPNI to customers at the retail store level. Given the nature of Crown Castle's business, there have been no requests made for account changes requiring customer notification under the FCC's rules; in the event such a request is made, Crown Castle would notify the customer in writing via mail to the address of record.

6. Crown Castle will timely notify law enforcement and customers of any breach of its customers' CPNI in accordance with FCC rules. Records of any breaches discovered will be maintained for a minimum of two years.

7. Any proposed or desired use of CPNI inconsistent with these Policies and Procedures must be approved by Crown Castle senior management and subject to appropriate legal review to ensure that such use is consistent with FCC rules.

8. All employees and contractors are required to review and acknowledge understanding of this policy in writing on an annual basis.